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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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DEVI RAJSHRI SETHUMADHAVA MENON

Docket No. 2:21-cv-08384

Plaintiff,

- against -

**WARD CORBETT AND CATALYST
PARTNERS MANAGEMENT LLC**

**CERTIFICATION OF AVRAM E.
FRISCH IN SUPPORT OF THE
MOTION TO PERMIT
ALTERNATE SERVICE**

Defendant.

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Pursuant to 28 U.S.C. § 1746, I, Avram E. Frisch, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the attorney for the Plaintiff in this action and make this declaration in support of Plaintiff's motion to allow alternate service on Defendant Ward Corbett in accordance with R. 4(e)(1), and thus in accordance with NJ Rules of Court R. 4:4-4(b)(3), which permits service in accordance with the terms of a court order that is consistent with due process of law.
2. Plaintiff's efforts to serve Mr. Corbett have been well documented before this Court. In deciding Plaintiff's prior motion for alternative service, the Court has accepted that Plaintiff has made diligent efforts to locate Mr. Corbett.

3. Magistrate Judge Clark's Opinion and Order, ECF #11, is hereby noted to the Court.

Plaintiff has taken additional steps to locate Mr. Corbett, including attempting service of a subpoena on the New York Urban League organization, of which he is listed as an officer. Plaintiff's efforts to serve the New York Urban League were not successful, as the organization does not appear to have an operating office location.

4. Subsequently, Plaintiff served a subpoena on Meta Inc. the owner of Facebook and Whatsapp for information in regard to the Defendant's Facebook account. Annexed hereto as **Exhibit A** is a true copy of the response to the subpoena from Facebook.

5. As is evident from the Facebook response, Mr. Corbett was an active user of Facebook, along with the evidence from his public Facebook page where he discussed the recent death of his mother. The phone numbers and email address indicated in the Facebook documentation match those provided by Ms. Menon.

6. Unfortunately, for privacy reasons, Facebook refuses to provide records of logins and activity beyond what they have provided here.

7. As detailed in the annexed declaration of Plaintiff, Mr. Corbett's phone number during their relationship was 646-824-9273 and she had extensive conversation with him on that number.

8. Mr. Corbett is active on Facebook and Whatsapp at phone number 646-824-9273 and has active accounts on both services, along with email addresses at ward.corbett@gmail.com, ward.corbett@yahoo.com and ward@catalystlp.com.

9. A review of his Facebook account by myself today shows recent posts on February 1 and January 17, 2022. Facebook messenger and whatsapp also permit a party to a conversation to see if the message has been received and if it has been read.

10. We therefore propose to serve Mr. Corbett via Facebook Messenger, WhatsApp Messenger and Email. We believe that this will result in Mr. Corbett clearly seeing the complaint and as such comports with due process of law.

11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 27, 2022.

/s/ Avram E. Frisch
Avram E. Frisch

EXHIBIT A